

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA, *ex rel.*
ANTONI MUHAWI,

Plaintiff,

v.

PANGEA EQUITY PARTNERS, *et al.*,

Defendants.

Case No. 18-cv-02022

Hon. Manish S. Shah

Magistrate Judge Mary M. Rowland

DECLARATION OF KRUSHA EVANS

I, Krusha Evans, hereby declare as follows:

1. I am competent to give this Declaration, which is based upon my personal knowledge of the facts stated herein.

2. I am Counsel at Pangea Properties, a privately-held real estate investment trust based in Chicago that owns and operates over 10,000 apartments in Chicago, Indianapolis and Baltimore.

3. Since this action was unsealed and served on the Defendants in 2021, I have supervised the defense of this matter on behalf of all the Defendants.

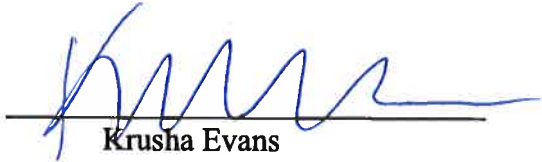
4. I caused a search to be made of all records in Defendants' custody or control to locate any records relating to an April 2015 request from the Chicago Housing Authority for copies of the rent rolls of Pangea buildings that had residents whose rent was paid pursuant to the Section 8 Housing Choice Voucher Program.

5. Attached as **Exhibits A – L** are true and correct copies of the extent of Pangea's communications with or regarding CHA on this issue that are in Defendants' custody or control.

Redactions have been made by outside counsel on the basis of attorney-client privilege. For explanatory purposes, I note that Jennifer Dean and Elisabeth Jackson were, at the relevant time, attorneys for Pangea.

Pursuant to the requirements of 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 27, 2022.



Krusha Evans